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10 Attorneys for Plaintiff

OVERTURE SERVICES, INC.

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16 Attorneys for Defendant

GOOGLE TECHNOLOGY INC.,

17 sued under its former name GOOGLE INC.

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 SAN FRANCISCO DIVISION

21
22 OVERTURE SERVICES, INC., a
23 Delaware Corporation,

24 Plaintiff,

25 vs.

26 GOOGLE INC., a California Corporation,

27 Defendant.
28

No. C02-01991 JSW (EDL)

**JOINT MOTION FOR ENTRY OF
STIPULATED SUPPLEMENTAL
PROTECTIVE ORDER RE EMAIL**

DISCOVERY MATTER

1 Plaintiff Overture Services, Inc. ("Overture") and defendant Google Technology,
 2 Inc. ("Google") jointly move pursuant to Rule 26(c)(7) of the Federal Rules of Civil
 3 Procedure for entry of a supplemental protective order regarding email. The proposed
 4 order, to which the parties stipulate, is attached hereto as an exhibit.

5 In light of the volume of email currently used in the normal course of business,
 6 and in light of the conventions for electronic storage of such email, the parties recognize
 7 and agree that the process of identifying and reviewing email for potential production in
 8 response to document requests presents special burdens. Accordingly, the parties
 9 agree to adopt and follow the protocol set forth in the attached proposed order
 10 governing responses to document requests seeking email in this case.

11
 12 Dated: August 11, 2003

BRINKS HOFER GILSON & LIONE

13 By: s/ Charles M. McMahon

14 Charles M. McMahon
 Attorneys for Plaintiff
 OVERTURE SERVICES, INC.

15 Dated: August 11, 2003

KEKER & VAN NEST, LLP

16 By: s/ Michael S. Kwun

17 Michael S. Kwun
 Attorneys for Defendant
 GOOGLE TECHNOLOGY, INC.,
 18 sued under its former name GOOGLE, INC.
 19

20 **DECLARATION OF CHARLES M. MCMAHON**

21 I, Charles M. McMahon, declare that prior to filing the above Joint Motion for
 22 Entry of Stipulated Supplemental Protective Order re Email, I sent it to Michael S. Kwun
 23 for his review, and he authorized me to file the Joint Motion on his behalf.

24 I declare under penalty of perjury under the laws of the United States of America
 25 that the foregoing is true and correct. Executed on this 11th day of August 2003 at
 26 Chicago, Illinois.

27 s/ Charles M. McMahon

Charles M. McMahon